Mr. Val Cannon, Manager
Quality Assurance
Nuclear Waste Partnership LLC
P. O. Box 2078
Carlsbad, NM 88221-2078

Subject: Issuance of CBFO Corrective Action Report 17-006 Identified During Audit A-17-07

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) performed Audit A-17-07 of the Oak Ridge National Laboratory Central Characterization Program Waste Acceptance Criteria compliance on October 17 – 19, 2016. Enclosed is Corrective Action Report (CAR) 17-006 addressing the condition adverse to quality identified during the audit.

Please provide a documented response for the CAR, ensuring that the required actions indicated in Block 11 are addressed, including a schedule for completion. Please return your response to me on or before the due date identified in Block 13a of the CAR form.

If you have any questions or comments concerning the CAR, please contact me at (575) 234-7483.

Sincerely,

[Signature]
Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure
S. Ross, EM-43
M. Brown, CBFO
J.R. Stroble, CBFO
D. Miehls, CBFO
G. Birge, CBFO
T. Carver, CBFO
L. Wilkerson, DOE-OR
W. McMillan, DOE-OR
J. Britain, NWP
F. Sharif, NWP
D.E. Gulbransen, NWP
R. Reeves, NWP
A.J. Fisher, NWP
M. Ramirez, NWP
J. Knox, NWP
J. Carter, NWP
B. Allen, NWP
S. Punchios, NWP
A. Boyea, NWP

T. Peake, EPA
J. Walsh, EPA
T. Peake, EPA
E. Feltcorn, EPA
R. Joglekar, EPA
J. Kieling, NMED
R. Maestas, NMED
C. Smith, NMED
V. Daub, CTAC
P. Martinez, CTAC
C. Castillo, CTAC
M. Leroch, CTAC
R. Castillo, CTAC
J. Schuetz, CTAC
P. Hinojos, CTAC
G. White, CTAC
Site Documents
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
**CBFO CORRECTIVE ACTION REPORT**

1. CAR No.: 17-006  
2. Activity Report No.: A-17-07  
3. Page 1 of 2

4. Controlling document:  
   - CCP-PO-005, Rev. 27  
   - CCP-QP-010, Rev. 25

5. Responsible CBFO Manager: Martin Navarrete

6. Responsible organization: ORNL/CCP

7. CAQ discussed with: Beverly Schrock, Rich Kantrowitz, Daniel Wade

8. Requirement:  
   See Continuation Sheet

9. Condition Adverse to Quality (CAQ):  
   See Continuation Sheet

10a. Significant CAQ?  
     (If "Yes", go to block 14b)  
     Yes ☐ No ☑

10b. Work Suspension recommended?  
     (If "Yes", go to block 14b)  
     Yes ☐ No ☑

10c. WAP-related Deficiency?  
     Yes ☐ No ☑

10d. Accelerated corrective action required?  
     (If "Yes", go to block 14b)  
     Yes ☐ No ☑

11. Type of actions required:  
   11a. Remedial?  
    Yes ☑ No ☐

   11b. Investigative?  
    Yes ☑ No ☐

   11c. Causal Analysis?  
    Yes ☐ No ☑

   11d. Actions to Preclude Recurrence?  
    Yes ☑ No ☐

12a. Trend Code:  
   SW - 02

12b. CAR Initiator: James R. Schuetz  
     Printed Name: James R. Schuetz  
     Date: 10/21/16

13a. Response due date: Nov. 23, 2016

13b. Required corrective action completion date: N/A

14. Concurrence:  
   a. Quality Assurance Director/Quality Assurance Representative:  
      Printed Name: Martin Navarrete  
      Date: 10-24-16

   b. CBFO Office of Quality Assurance Director: (If SCAQ, work suspension, or accelerated corrective action; otherwise mark as "N/A")  
      Printed Name: N/A

15. Acceptance of Proposed Corrective Actions:  
     Printed Name and Title:  
     Date

16. Acceptance of Corrective Action Completion:  
     Printed Name:  
     Date

17. Closure:  
     Printed Name:  
     Date
Block # **8** Requirement:

CCP-PO-005, Rev. 27, *CCP Conduct of Operations*, Section 18.7, states in part: "If, in the opinion of the operator, a procedure cannot be performed as written, the system or component will be placed in a safe condition and CCP management informed so the discrepancy can be corrected."

(This is the requirement related to stopping implementation of the procedure if the operator determines that it cannot be performed as written, with respect to implementing procedure CCP-TP-200 and the computer fields in the OAKES database.)


CCP-QP-010, Rev. 25, *CCP Document Preparation, Approval, and Control*, Section 4.1.15, states: "Perform the review using the criteria established in Section 3.3."

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Block # **9** Condition Adverse to Quality (CAQ):

The process for documenting the Chemical Compatibility Evaluation Memorandum and Acceptable Knowledge Assessment Reviews is inconsistent with respect to the work steps described in the implementing procedure CCP-TP-200, and as constructed in the Open Acceptable Knowledge Evaluation Software (OAKES) database fields.
### INSTRUCTIONS FOR PROVIDING A CORRECTIVE ACTION PLAN

**WASTE ISOLATION PILOT PLANT**  
**U.S. DEPARTMENT OF ENERGY**  
**Carlsbad Field Office**

You are requested to provide a corrective action plan (CAP) in response to this corrective action report (CAR) by the completion date identified in block 13b of the CAR. If this date cannot be met, provide a written request for extension to the Quality Assurance Representative with courtesy copy to the Office of Quality Assurance Director. This request must include justification for the delay and must be provided seven calendar days prior to the response due date (CAR block 13a).

The CAP shall address the corrective actions indicated in CAR block 11. As appropriate, develop the plan in accordance with the following sequence and format:

1. Corrective action response for CAR # 17-006
   
   **A. Remedial Actions** - Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during discovery.

   **B. Investigative Actions** - Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.

   **C. Causal Analysis** - Identify the causal factor(s) of the CAR condition. Refer to Step 5.3.2 if the CAR was issued to CBFO or Step 5.3.3 if the CAR was issued to a participant organization.

   **D. Actions to Preclude Recurrence** - Identify the corrective actions required to address the causal factors of the condition in order to preclude recurrence.

   **NOTE:** Schedule for completion of corrective actions is always required.

2. For each action above, identify the anticipated (or actual, if complete) completion date.

3. The response must identify the individual having the overall responsibility for completion of the corrective actions.